

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA,**

**Respondent,**

**v.**

**PATRICK ALBERT BYERS,**

**Petitioner.**

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**CRIMINAL NO. RDB-08-056  
CIVIL NO. RDB-12-2348**

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**CONSENT MOTION TO EXTEND TIME FOR RESPONSE**

COMES NOW the United States of America, by and through its undersigned counsel, and with the consent of the Defendant/Petitioner respectfully requests an extension of time on its response, and in support whereof states as follows:

1. On March 22, 2022, this Court entered an order permitting Defendant Patrick Albert Byers to amend his original 2255 petition to add claims regarding his convictions and sentences on Counts Three, Four, and Eight. ECF 534.
2. Pursuant to that order, on July 11, 2022, Defendant filed an amended petition as to Counts Three, Four, and Eight. ECF 543. In addition, the Defendant sought leave to expand his challenges to all of his convictions. *Id.*
3. Under the current briefing schedule, the government's response is due October 19, 2022. ECF 552.
4. However, given the press of numerous matters before this Court and the Fourth Circuit, undersigned counsel needs additional time to file its response. Moreover, given that the Defendant's challenges have expanded the playing field to all of his counts of conviction, this

has necessitated additional research through the archived files for this matter. Accordingly, the government respectfully requests an additional 10-day extension of time to file its response.

5. Undersigned counsel emailed defense counsel regarding this request. Defense counsel graciously indicated his consent via return email.

Wherefore, based on the foregoing, the government respectfully requests a 10-day extension of time on its response brief, which will make such response due on or before October 29, 2022.

Respectfully submitted,

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/s/  
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